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Attorneys for the United States

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

| | | |
|---------------------------|---|------------------------------------|
| UNITED STATES OF AMERICA, |) | NO. CR-19-00489 JST |
| Plaintiff, |) | |
| v. |) | STIPULATION AND [PROPOSED] ORDER |
| |) | SETTING CHANGE OF PLEA HEARING VIA |
| |) | ZOOM WEBINAR FOR OCTOBER 1, 2021. |
| OLEG TINKOV |) | |
| A/K/A/ OLEG TINKOFF, |) | |
| Defendant. |) | |

Defendant Oleg Tinkov, by and through his retained counsel, the United States Attorney's Office for the Northern District of California, by and through Assistant United States Attorney Michelle J. Kane, and the United States Department of Justice, Tax Division, by and through Assistant Chief Yael T. Epstein, hereby stipulate and agree to the following:

1. A grand jury sitting in the Northern District of California returned an indictment on September 26, 2019, charging the defendant with two counts of subscribing to a false tax return,

STIP. & [PROPOSED] ORDER
CR-19-00489 JST

1 statement, or other document, in violation of 26 U.S.C. § 7206(1). The indictment was unsealed
2 following defendant's arrest in London on these charges on February 26, 2020.

3 2. The defendant has not yet appeared in this case. The defendant is currently in the United
4 Kingdom (UK) contesting extradition and has provided to the government and a court in the UK expert
5 medical reports supporting his claim that he is undergoing a UK-based intensive treatment plan for acute
6 myeloid leukemia and graft versus host disease, is immunocompromised, and will be unable to safely
7 travel as a result.

8 3. The parties have reached an agreement to resolve this matter.

9 4. The parties therefore request that the matter be set for a change of plea via Zoom webinar
10 before this Court on October 1, 2021, at 9:00 a.m. Counsel for the United States will submit the written
11 plea agreement for the Court's review. Once the matter is set for change of plea, the parties will request
12 that the matter be set before the Duty Magistrate for arraignment on the indictment prior to entry of the
13 change of plea.

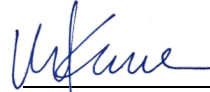
14 5. The defendant understands that, under the Constitution, the United States Code, the
15 Federal Rules of Criminal Procedure (including Rules 11, 32, and 43), he may have the right to be
16 physically present at these hearings. He understands that right and, after consulting with counsel,

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voluntarily agrees to waive it and to proceed with remote proceedings, and in particular, video-
teleconference ("VTC") or telephone, if VTC is not reasonably available, from the United Kingdom.

IT IS SO STIPULATED.

STEPHANIE M. HINDS
Acting United States Attorney



MICHELLE J. KANE
Assistant United States Attorney

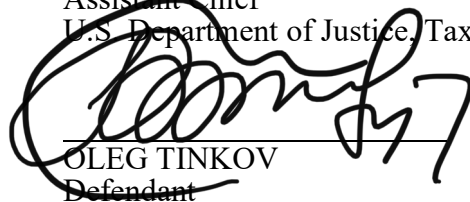
Dated: September 17, 2021

Dated: September 17, 2021

/s/


Yael T. Epstein
Assistant Chief
U.S. Department of Justice, Tax Division

Dated: September 17, 2021




OLEG TINKOV
Defendant

Dated: September 17, 2021



JEREMY H. TEMKIN, Esq.
Pro Hac Vice Motion Pending
Attorney for Defendant

Dated: September 17, 2021



CHRISTOPHER MORVILLO, Esq.
Pro Hac Vice Motion Pending
Attorney for Defendant

Dated:

/s/
ISMAIL RAMSEY, Esq.
Attorney for Defendant

ORDER

Based on the stipulation of the parties and for good cause shown, the Court HEREBY ORDERS:

WHEREAS the proceeding cannot be conducted in person without seriously jeopardizing public health and safety; and

WHEREAS there are specific reasons, in this particular case, that the change of plea cannot be further delayed without serious harm to the interests of justice;

THEREFORE, the matter of *United States v. Oleg Tinkov*, No. 19-CR-00489, be set for a change of plea via Zoom webinar before this Court on October 1, 2021, at 9:00 a.m.

IT IS SO ORDERED.

DATED: _____

HON. JON S. TIGAR
United States District Judge